

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

The Estate of Gene B. Lokken, Glennette Kell,
Darlene Buckner, Carol Clemens, Frank
Chester Perry, The Estate of Jackie Martin,
John J. Williams, as Trustee of the Miles and
Carolyn Williams 1993 Family Trust, and
William Hull, individually and on behalf of all
others similarly situated,

Civil File No. 23-cv-03514-JRT-DTS

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANTS
TO RESPOND TO THE AMENDED
COMPLAINT**

Plaintiffs,

vs.

UNITEDHEALTH GROUP, INC., UNITED
HEALTHCARE, INC., NAVIHEALTH,
INC. and Does 1-50, inclusive,

Defendants.

Plaintiffs The Estate of Gene B. Lokken, Glennette Kell, Darlene Buckner, Carol Clemens, Frank Chester Perry, The Estate of Jackie Martin, John J. Williams, as Trustee of the Miles and Carolyn Williams 1993 Family Trust, and William Hull (“Plaintiffs”) and Defendants UnitedHealth Group, Inc., United Healthcare, Inc., and NaviHealth, Inc. (“Defendants”), by and through their undersigned counsel, hereby agree and stipulate as follows:

1. On April 5, 2024, Plaintiffs filed an Amended Complaint. The Amended Complaint dismissed Plaintiff The Estate of Dale Henry Tetzloff, added an additional seven named Plaintiffs and amended certain of the causes of action.

2. Under Rule 15(a)(3) of the Federal Rules of Civil Procedure, the current deadline for Defendants to answer, move or otherwise respond to the Amended Complaint is April 19, 2024.

3. The Parties agree that Defendants' shall have an extension until May 20, 2024, to answer move or otherwise respond to Plaintiffs' Amended Complaint.

Dated: April 17, 2024

LOCKRIDGE GRINDAL NAUEN PLLP

By s/ David W. Asp

Karen Hanson Riebel (#0219770)

David W. Asp (#0344850)

Derek C. Waller (#0401120)

100 Washington Ave. South, Suite 2200

Minneapolis, MN 55401

Telephone: 612-339-6900

khriebel@locklaw.com

dwasp@locklaw.com

kgmarttila@locklaw.com

dcwaller@locklaw.com

Glenn A. Danas, Esq.

Ryan Clarkson, Esq.

Zarrina Ozari, Esq.

Pro Hac Vice

CLARKSON LAW FIRM, P.C.

22525 Pacific Coast Highway

Malibu, CA 90265

Telephone: 213-788-4050

gdanas@clarksonlawfirm.com

rclarkson@clarksonlawfirm.com

zozari@clarksonlawfirm.com

James Pizzirusso

Pro Hac Vice Forthcoming

HAUSFELD LLP

888 16th St., NW.
Ste. 300
Washington, DC 20006
Telephone: 202-540-7200

Attorneys for Plaintiffs

Dated: April 17, 2024

DORSEY & WHITNEY LLP

By s/ Michelle S. Grant

Nicole Engisch (#0215284)
engisch.nicole@dorsey.com
Michelle S. Grant (#0311170)
grant.michelle@dorsey.com
Shannon L. Bjorklund (#0389932)
bjorklund.shannon@dorsey.com
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402
Telephone: (612) 340-2600
Facsimile: (612) 340-2868

Nicholas J. Pappas (*pro hac vice*)
Pappas.nicholas@dorsey.com
DORSEY & WHITNEY LLP
51 West 52nd Street
New York, NY 10019-6119
Telephone: (212) 415-9387

Attorneys for Defendants